UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: NATHAN TYLER GUISE and : CHAPTER 13

ASHLEY L. GUISE

Debtor(s)

: :

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

:

VS.

:

NATHAN TYLER GUISE and

ASHLEY L. GUISE

Respondent(s) : CASE NO. 1-16-bk-03836

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 27th day of October, 2016, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.
- 2. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
 - a. Paystub for month ending October, 2016.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/James K. Jones

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 7th day of November, 2016, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Stephen Wade Parker, Esquire 230 York Street Hanover, PA 17331

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee